



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 300303-8960

July 14, 2005

Chief, Rules Review and Directives Branch
U.S. Nuclear Regulatory Commission
Mail Stop T6-D59
Washington, D.C. 20555-0001

**RE: EPA Review and Comments on NUREG-1817
Early Site Permit (ESP) at the Grand Gulf ESP Site
Draft Environmental Impact Statement (DEIS)
CEQ No. 20050173**

Dear Sir:

The U.S. Environmental Protection Agency (EPA) reviewed the subject *Draft Environmental Impact Statement* (DEIS) Pursuant to Section 102(2)(C) of the National Environmental Policy Act (NEPA), and Section 309 of the Clean Air Act. The document provides information to educate the public regarding general and project-specific environmental impacts and analysis procedures, and follows the public review and disclosure aspects of the NEPA process. The purpose of this letter is to inform you of the results of our review.

System Energy Resources, Inc. applied for an early site permit for the Grand Gulf ESP site, co-located with the existing Grand Gulf Nuclear Station. The proposed action is to approve a site within the existing Grand Gulf Nuclear Station boundaries as suitable for the construction and operation of a new nuclear power generating facility, and to issue an ESP for the proposed site. During this time, the site would be "banked" for up to 20 years, during which time a reactor type could be chosen, and a construction and operating license could be applied for.

The DEIS discusses the proposed action and alternatives. Based on EPA's review of the DEIS, the document received an EC-2 rating, meaning that environmental concerns exist regarding aspects of the proposed project, and additional information needs to be provided in the Final EIS. Specifically, the DEIS notes that in the high-level waste and spent fuel disposal component of the fuel cycle, there is some uncertainty with respect to regulatory limits for offsite releases of radionuclides for the current candidate repository site. EPA also requests additional information regarding: public health assessments, Environmental Justice, wetlands and aquifer impacts, and clarification of purpose and need.

In the Waste Confidence Rule (10 CFR 51.23), the Commission generically determined that the spent fuel generated by any reactor can be safely stored onsite for at least 30 years beyond the licensed operating life of the reactor. Ultimately, long-term radioactive waste disposition will require transportation of wastes to a permitted repository site. We are aware of ongoing efforts to license a geological repository for long-term disposition within the first quarter of the twenty-first century.

Protecting the environment involves the need for appropriate storage and ultimate disposition of radioactive wastes generated on-site. The OL will require radiological monitoring of all plant effluents. Appropriate storage of spent fuel assemblies and radioactive wastes on-site is required, in order to prevent impacts.

Thank you for the opportunity to comment on this DEIS. Also, based on the number of comments and issues raised in our letter, we believe it would be beneficial to discuss the comments and your proposed responses prior to the finalization of the FEIS. Please contact Ramona McConney of my staff at (404) 562-9615, to coordinate a meeting or conference call.

Sincerely,

/S/

Heinz J. Mueller, Chief
NEPA Program Office

Enclosed: EPA Review and Comments
 Summary of Rating Definitions